

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

**v.**

REYNARD VIRGIL ROBINSON, JR.,

a/k/a "SNOWMAN,"

a/k/a "TOO LOW,"

**Defendant.**

CRIMINAL NO.

( Caldwell H. J. )

**FILED**  
**HARRISBURG, PA**

SEP 01 2010

MARY E. D'ANDREA, CLERK  
Per \_\_\_\_\_  
Deputy Clerk

## I N D I C T M E N T

## COUNT I

Possession of Cocaine Base with the Intent to Distribute  
Title 21, United States Code, Section 841

**THE GRAND JURY CHARGES THAT:**

On or about from August 19, 2008, within the Middle District  
of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

knowingly and intentionally distributed, dispensed, and possessed with the intent to distribute and dispense a mixture and substance containing a detectable amount of cocaine base, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C) .

COUNT II

Possession of Cocaine Base with the Intent to Distribute  
Title 21, United States Code, Section 841

THE GRAND JURY FURTHER CHARGES THAT:

On or about from August 26, 2008, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

knowingly and intentionally distributed, dispensed, and possessed with the intent to distribute and dispense a mixture and substance containing a detectable amount of cocaine base, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT III

Felon in Possession of Firearm  
Title 18, United States Code, Section 922(g)(1)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting

interstate commerce, a firearm, that is, a SIG, Model SP2340, .40 caliber semi-automatic pistol, serial number SP0050153, said firearm having been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g), 924(a)(2), and 924(e).

COUNT IV

Possession of Firearm in Furtherance of Drug Trafficking  
Title 18, United States Code, Section 924(c)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

did knowingly carry, use and possess a firearm during, in relation to, and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States; namely, distribution of cocaine base, and possession of cocaine base with the intent to distribute, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNT V

Possession of Cocaine Base with the Intent to Distribute  
Title 21, United States Code, Section 841

THE GRAND JURY FURTHER CHARGES THAT:

On or about from January 2, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

knowingly and intentionally distributed, dispensed, and possessed with the intent to distribute and dispense a mixture and substance containing a detectable amount of cocaine base, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C).

COUNT VI

Felon in Possession of Firearm  
Title 18, United States Code, Section 922(g) (1)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that

is, a Lorcin, Model L380, 380 caliber semi-automatic pistol, serial number SP189636, said firearm having been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g) and 924(a)(2), and 924(e).

COUNT VII

Possession of Firearm in Furtherance of Drug Trafficking  
Title 18, United States Code, Section 924(c)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

did knowingly carry, use and possess a firearm during, in relation to, and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States; namely, distribution of cocaine base, and possession of cocaine base with the intent to distribute, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNT VIII

Possession of Cocaine Base with the Intent to Distribute  
Title 21, United States Code, Section 841

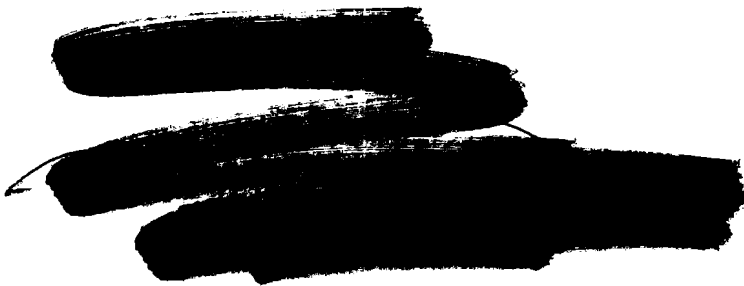
THE GRAND JURY FURTHER CHARGES THAT:

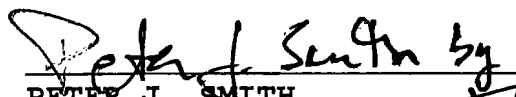

On or about from June 8, 2010, within the Middle District of Pennsylvania, the defendant,

REYNARD VIRGIL ROBINSON, JR.,

knowingly and intentionally distributed, dispensed, and possessed with the intent to distribute and dispense a mixture and substance containing a detectable amount of cocaine base, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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PETER J. SMITH  
United States Attorney 

9/1/2010  
Date